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January 13, 2025

Via ECF

Hon. Cheryl L. Pollak
U.S. Magistrate Judge
Eastern District of New York
225 Cadman Plaza
Brooklyn, NY 11201

Re: *Illuminada Ortega v. Ruben Yeghoyan et al*, 21 cv 01125
Request to Stay Deadline for Filing Answer to Fourth Amended Complaint by Defendant
Ruben Yeghoyan and Defendant Champagne Room BK, Inc.

Dear Judge Pollak:

I represent Defendant Ruben Yeghoyan and Corporate Defendant Champagne Room BK, Inc. (hereinafter “Corporate Defendant”) on the above captioned matter. I respectfully write with consent of the Plaintiff’s counsel Emanuel Kataev, Esq. to stay the deadline for Defendant Yeghoyan and Corporate Defendant to answer the Fourth Amended Complaint (ECF No. 100) pending the Court’s decision on the settlement agreement.

On November 28, 2024, Plaintiff Ortega filed a motion for court approval on a revised settlement agreement (ECF No. 101) pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199 (2d Cir. 2015), cert. denied, 136 S. Ct. 824 (2016). On December 28, 2024, Plaintiffs’ counsel submitted billing records for their time dedicated to the case (ECF No. 103).

If the Court approves the settlement agreement, Defendant Yeghoyan and Corporate Defendant will be terminated from the case. Therefore, I am respectfully seeking a stay on behalf of Defendant Yeghoyan and the Corporate Defendant of the January 13, 2025 deadline to answer the fourth amended complaint, pending Court’s decision on the settlement agreement.

Thank you for your time and consideration of this request.

Respectfully Submitted,

s/ Elena Fast

Elena Fast, Esq.

Counsel for Defendant Ruben Yeghoyan and Champagne Room BK, Inc.